

Appendix A to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Letter dated December 20, 2024 [ECF No. 287]	Letter contains (1) references to sealed letter on docket (ECF No. 109); (2) a direct reference to a confidential presentation and business records produced by Save On SP, LLC (“SaveOn”) that comprise proprietary business information, <i>see</i> ECF No. 287 at Ex. 1-2; and (3) a direct reference to a confidential deposition transcript, <i>see</i> ECF No. 287 at Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	Yes, <i>see</i> ECF No. 109.	No objection.
Exhibit 1 to Letter dated December 20, 2024 [ECF No. 287]	Exhibit is a confidential presentation created by Express Scripts, Inc. comprising proprietary business information about SaveOn. <i>See</i> ECF No. 287 at Ex. 1.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn’s proprietary business information.	No	No objection

Exhibit 2 to Letter dated December 20, 2024 [ECF No. 287]	Exhibit 2 contains an evaluation of an employee's phone call to a patient, comprising proprietary business information. <i>See ECF No. 287 at Ex. 2.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 3 to Letter dated December 20, 2024 [ECF No. 287]	Exhibit 3 is a confidential deposition transcript of a SaveOn employee, containing direct and substantive reference to the contents of SaveOn's business plan. <i>See ECF No. 287 at Ex. 3.</i>	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection